REMARKS

Claims 6-9, 19 and 20 are currently pending, wherein claims 6 and 20 have been amended to correct typographical errors. Applicants respectfully request favorable reconsideration in view of the remarks presented herein below.

In paragraph 3 of the Office Action ("Action"), the Examiner rejects claims 6-9 and 20 under 35 U.S.C. 112, second paragraph, as allegedly being indefinite. More specifically, the Examiner asserts that there is insufficient antecedent basis for the limitation "the pad" recited in claim 6. Applicants have amended claims 6 and 20, thereby addressing the Examiner's concerns. Accordingly, Applicants request reconsideration and withdrawal of the rejection of claims 6-9 and 20 under 35 U.S.C. 112, second paragraph.

In paragraph 7 of the Action, the Examiner rejects claims 6-9 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,966,589 to Watanabe et al. ("Watanabe") in view of U.S. Patent No. 6,016,174 to Endo et al. ("Endo") and U.S. Patent No. 5,492,582 to Ide et al. ("Ide"). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. §103, the Examiner must establish a prima facie case of obviousness. To establish a prima facie case of obviousness three criteria must be met. First, there must be some motivation to modify or combine the cited references. Second, there must be a reasonable expectation of success. Finally, the combination must disclose each and every claimed element. In the present case, claims 6-9 are not rendered unpatentable by the combination of Watanabe, Endo and Ide because the Examiner fails to establish a prima facie case of obviousness. Claims 6-9 are allowable over the cited references in that each of these claims recites a combination of elements including, for example, "wherein the entire upper, side, and end surfaces of the gate and data pads are completely covered by the insulting film and the anisotropic conductive film." None of the

cited references including Watanabe, Endo and Ide, singly or in combination, teaches or suggests at least this feature of the claimed invention.

The Examiner relies upon Endo as teaching this feature of the present invention. (See Office Action p. 4.) The Examiner then also states that this feature is not shown in the cited Figs. 3 and 4 of Endo, but shown in the text bridging columns 11 and 12 of Endo. The text cited though does not teach this feature. The text states: "ACF is placed at the position completely covering the first TCP terminal contact 22 and the second TCP terminal contact 26." The problem is that the Examiner clearly identifies 20 and 24 of Endo as the gate and data pads. The section cited and highlighted by the Examiner is directed to the TCP terminal contacts 22 and 26. Nowhere does Endo teach that the gate and data pads 20 and 24 are "completely covered by the insulating film and the anisotropic conductive film."

Accordingly, claims 6-9 are allowable over Watanabe, Endo, and Ide.

In paragraph 8 of the Action, the Examiner rejects claims 19 and 20 under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,310,667 to Nakayoshi ("Nakayoshi") in view of Ide. Applicants respectfully traverse this rejection.

The rejection of claim 19 is respectfully traversed and reconsideration is requested.

Claim 19 is allowable over the cited references in that each of these claims recites a combination of elements including, for example, "an insulating film formed on the pad contact area of the pad but absent from the grinding area, the insulating film entirely covering the side and end surfaces of the pad and a portion of the substrate adjacent to the side surfaces of the pad." None of the cited references including the Nakayoshi and Ide, singly or in combination, teaches or suggests at least this feature of the claimed invention.

In the Office Action, the Examiner identifies the pad as "those portions of the data lines DL1, DL2, etc., and gate lines GL1, GL2, etc. directly beneath and not extending

beyond the area labeled as drain inspection terminals DTM (as DTM1, DTM2, etc.) and gate inspection terminals GTM (as GTM1, GTM2, etc.). This is consistent with the specification and figure in Nakayoshi because DTM and GTM are the pad contact areas." DTM and GTM are inspection terminals. DTCP and GTCP are the gate and data terminals for inputing gate and data signals into the display. (See Nakayoshi, col. 15, line 61 - col. 16, line 5.) Further, nowhere does Nakayoshi identify the above identified feature associated with DTCP and GTCP. Accordingly, claim 19 is allowable over Nakayoshi and Ide.

The rejection of claim 20 is respectfully traversed and reconsideration is requested.

Claim 20 is allowable over the cited references in that each of these claims recites a combination of elements including, for example, "wherein the insulating film covers the entire side and end surfaces of the pad and a portion of the substrate adjacent to the side and end surfaces of the pad such that the insulating film and the at least one conductive layer are absent in the grinding region." None of the cited references including the Nakayoshi and Ide, singly or in combination, teaches or suggests at least this feature of the claimed invention.

Claim 20 is allowable over Nakayoshi and Ide for the same reasons cited with respect to claim 19 above.

The application is in condition for allowance. Notice of same is earnestly solicited. Should the Examiner find the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to

complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911.

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Respectfully submitted,

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